

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

PJR CONSTRUCTION OF NEW JERSEY,
INC.,

Plaintiff,

v.

VALLEY FORGE INSURANCE
COMPANY AND NATIONAL FIRE
INSURANCE COMPANY OF
HARTFORD

Defendants.

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: *CIVIL ACTION NO. 3:17-CV-04219*
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NOTICE OF MOTION FOR SUMMARY JUDGMENT

To: Thomas J. DiChiara Esq.
Drazin & Warshaw, P.C.
25 Reckless Place
P.O. Box 8909
Red Bank, NJ 07701

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 56 and D.N.J. Local Rule 56.1, Defendants Valley Forge Insurance Company (“Valley Forge”) and National Fire Insurance Company of Hartford (“National Fire”) (collectively “Moving Defendants”) hereby move before the Honorable Michael A. Shipp at the United States District Courthouse, 402 East State Street, Trenton, NJ 08608, seeking dismissal of Plaintiff PJR Construction of New Jersey’s (“Plaintiff” or

“PJR”) Complaint with prejudice on the grounds that there is no material issue of fact and that Moving Defendants are entitled to judgment as a matter of law.

Moving Defendants’ basis and reasoning for said motion are set forth in its Memorandum of Law, Rule 56.1 Statement of Material Facts, and supporting Affirmation of Counsel and Exhibits filed herewith.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Order of the Court dated October 16, 2018, this motion is returnable January 22, 2019.

PLEASE TAKE FURTHER NOTICE that Moving Defendants hereby consent to an extension of time for Plaintiff to file opposition to this motion to January 11, 2019.

Dated: December 21, 2018

CNA COVERAGE LITIGATION GROUP

By: _____

Seth Goodman Park, Esq.
125 Broad Street, 7th Floor
New York, NY 10004
(212) 440-2746
(212) 440-2749 – Fax
seth.park@cna.com
Counsel for Defendants
Valley Forge Insurance Company and
National Fire Insurance Company of
Hartford

Certificate of Service

I hereby certify that I served a copy of the foregoing Notice of Motion via ECF on December 21, 2018, and that I served a courtesy copy via Overnight Mail on December 20, 2018, upon the following party:

**Thomas J. DiChiara Esq.
Drazin & Warshaw, P.C.
25 Reckless Place
P.O. Box 8909
Red Bank, NJ 07701**

Dated: *December 21, 2018*

CNA COVERAGE LITIGATION GROUP

By: */s/ Seth Goodman Park*
Seth Goodman Park, Esq.
125 Broad Street, 7th Floor
New York, NY 10004
(212) 440-2746
(212) 440-2749 – Fax
seth.park@cna.com
Counsel for Defendants
Valley Forge Insurance Company and
National Fire Insurance Company of
Hartford